

III. REMARKS

Claims 1-14 are pending in this application. By this amendment, claims 15-18 have been added. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-14 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chouinard (U.S. Patent No. 6,671,701), hereafter "Chouinard," in view of Brandt *et al.* (U.S. Patent No. 6,714,979), hereafter "Brandt." Applicants traverse the rejection for the following reasons.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Applicants respectfully submit that the Chouinard and Brandt references, taken alone or in combination, fail to meet each of the three basic criteria required to establish a *prima*

facie case of obviousness. As such, the rejection under 35 U.S.C. 103(a) is defective.

Initially, Applicants submit that there is no motivation to combine the Chouinard and Brandt references. One of the stated objects in Chouinard is to simplify and automate the file conversion process. Adding the database of Brandt would only add an additional component to the system without providing additional functionality, which is in opposition to Chouinard's stated goal of simplicity. Accordingly, the combination of the database in Brandt with the Chouinard system would destroy the stated purpose of Chouinard, namely, simplicity. In addition, neither Chouinard nor Brandt addresses the problem that is solved by the claimed invention, that is, synchronizing inbound messages to avoid the problems caused by messages arriving in a system in an incorrect order. Accordingly, the combination of Chouinard with Brandt to solve this problem is not obvious. For the above reasons, the Office has failed to provide a *prima facie* case of obviousness. Accordingly, Applicants request withdrawal of the rejection.

Furthermore, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 8 and 12, Chouinard, contrary to the Office's assertion, fails to teach or suggest receiving in the web-based application a stream of the document messages from the back office system. Instead, the passage in Chouinard cited by the Office teaches that "...file server acts as a file manager, which receives, stores, queues, caches, and transmits files of data between LAN members." Col. 4, lines 11-13. However, the actions of the file server in Chouinard are performed on members of a LAN, not on sites in the web. Chouinard also teaches that the LAN in Chouinard may encompass a WAN. Col. 4, lines 30-42. However, nowhere does Chouinard

teach or suggest that the LAN or WAN can be the web. Accordingly, Chouinard does not teach that its file server is a web-based application. In contrast, the claimed invention includes "...receiving in the web-based application a stream of the document messages from the back office system." Claim 1. As such, the application as included in the claimed invention is not merely file manager for a LAN or WAN as is the file server in Chouinard, but is instead a web-based application. Thus, the file server in Chouinard is not equivalent to the web-based application as included in the claimed invention. Brandt does not cure this deficiency. Accordingly, Applicants respectfully request that the Office's rejection be withdrawn.

With further respect to independent claims 1, 8 and 12, Applicants respectfully submit that the cited references fail to teach or suggest receiving a stream of document messages. The Office attempts to equate the files of data in Chouinard with the stream of document messages as included in the claimed invention. However, the files of data in Chouinard are statically stored in the file server and as such are not messages. Furthermore, the files of data in Chouinard are read from the static storage location, converted to another format and written to another static storage location, and as such, are not messages. Nowhere, does Chouinard teach receiving a stream of document messages. In contrast, the claimed invention includes "...receiving a stream of document messages." Claim 1. As such, the stream of inbound document messages as included in the claimed invention is not simply a file in a static source directory as in Chouinard, but is instead a stream that may include multiple inbound messages concerning the same document. Furthermore, in contrast to the static nature of the Chouinard files, the stream of inbound messages as included in the claimed invention are messages, and as such, are sent from one location to another. Thus, the stream of inbound document messages as included in the claimed

invention is not equivalent to the file in a source directory in Chouinard. Brandt does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With still further regard to independent claims 1, 8 and 12, Applicants assert that, contrary to the Office's assertion, Chouinard fails to teach or suggest operating the web-based application database to maintain inbound document message information comprising primary key codes and said timestamps for selected document messages previously received by the web-based application database. Instead, the passage in Chouinard cited by the Office teaches only that "...a time and date stamp of the destination files is stored in a database." Col. 2, lines 14-44. As such, Chouinard teaches only a time and date stamp and not both a timestamp and a primary key code. In contrast, the present invention includes "...operating the web-based application database to maintain inbound document message information comprising primary key codes and said timestamps for selected document messages previously received by the web-based application database." Claim 1. As such the document message information is not only a time and date stamp as in Chouinard, but rather comprises primary key codes and timestamps for selected document messages previously received by the web-based application database. Thus, the document messages information as included in the claimed invention is not equivalent to the time and date stamp of Chouinard. Brandt does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to claims 2, 14 and 16, Applicants submit that, contrary to the Office's assertion, Chouinard fails to teach or suggest that the primary key comprises document type information and document identification information. Instead, the passage of Chouinard cited by

the Office teaches only a time and date stamp. Col. 2, lines 14-44. Furthermore, Chouinard only teaches documents of one type, that is CAD documents, and Chouinard does not teach that this document type information is included in a primary key. Nowhere, in this passage or elsewhere does Chouinard teach or suggest a primary key that comprises document type information and document identification information. In contrast, the claimed invention includes "...the primary key comprises document type information and document identification information." Claim 2. As such, the primary key as included in the claimed invention is not simply a time and date stamp as in Chouinard, but instead includes both document type and document identification information. For the above stated reasons, the features of Chouinard cited by the Office are not equivalent to the primary key as included in the claimed invention. Brandt does not cure this deficiency. Accordingly, Applicants request that the Office withdraw its rejection.

With respect to claims 15, 17 and 18, Applicants submit that the cited art also fails to teach or suggest that the document type information includes at least one of order confirmation, order delivery, order invoice, product inventory updates, product price updates and customer information updates. In contrast, the document type taught in Chouinard is CAD documents. Col. 3, lines 26-38. Likewise, the document type taught in Brandt is telecommunications data. Col. 3, lines 26-47. Nowhere, do the cited references teach documents of the types detailed above. Accordingly, Applicants respectfully request the Office's withdrawal of the rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these

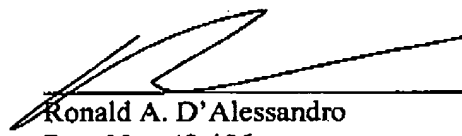
rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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Ronald A. D'Alessandro
Reg. No.: 42,456

Hoffman, Warnick & D'Alessandro LLC
Three E-Comm Square
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)